

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-X

RUKHSANA Y. AGHA,

Plaintiff,

-against-

JOSE L. RAMIREZ and JB HUNT TRANSPORT  
INC.,

Docket No.: 1:19-CV-0

**NOTICE OF REMOVAL**

Supreme Court,  
Queens County  
Index No.: 718780/2018

Defendants.

-X

The defendants, **JOSE L. RAMIREZ and J.B. HUNT TRANSPORT, INC. s/h/a JB HUNT TRANSPORT INC.**, remove this action from the Supreme Court, Queens County to the United States District Court for the Eastern District of New York.

1. The plaintiff commenced this action against **JOSE L. RAMIREZ and J.B. HUNT TRANSPORT, INC. s/h/a JB HUNT TRANSPORT INC.** in the Supreme Court of the State of New York, Queens County. A copy of the complaint is attached as **Exhibit “A”**.

2. The plaintiff, Rukhsana Y. Agha, is a citizen of the State of New York and was a citizen of the State of New York when this action was started in state court.

3. The defendants are citizens of a state other than the State of New York and were citizens of a state other than the State of New York when this action was started in state court.

a.) J.B. Hunt Transport, Inc. is (and was) a corporation incorporated in the State of Georgia with its principal place in business in Lowell, Arkansas.

b.) Jose L. Ramirez, upon information and belief, resides and has been residing in Monroe County, Tobyhanna Township, Pennsylvania when this action was started in state court. Jose L. Ramirez is a citizen of the State of Pennsylvania.

4. J.B. Hunt Transport, Inc. was served on December 17, 2018 and Jose L. Ramirez was served on December 18, 2018.

5. This court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and when it was started—is between citizens of different states and the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

7. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the District Courts of the United States have original jurisdiction that is brought in a state court.

8. All defendants join in the removal of this action to this Court.

Dated: New York, New York  
January 24, 2019

RAWLE & HENDERSON LLP  
Attorneys for Defendants  
**JOSE L. RAMIREZ and J.B.  
HUNT TRANSPORT, INC. s/h/a  
JB HUNT TRANSPORT INC.**



By:

---

Anthony D. Luis, Esq.  
14 Wall Street – 27<sup>th</sup> Floor  
New York, New York 10005-2101  
Telephone No.: 1 (212) 323-7070  
Fax No.: 1 (212) 323-7099  
Our File No.: 804201

TO: Hermann P. Gruber, Esq.  
STEINBERG & GRUBER, P.C.  
300 Garden City Plaza, Ste. 218  
Garden City, New York 11530  
Telephone No.: 1 (516) 663-0999  
Attorney for Plaintiff  
**RUKHSANA Y. AGHA**